

# RIDLEY SCHOOL DISTRICT

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MS. LEE ANN WENTZEL  
SUPERINTENDENT

29 July 2019

Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554

Dear Chairman Pai,

Please accept this thank you for the Federal Communications Commission's (FCC) continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools, such as the Ridley School District, to obtain affordable telecommunications and Internet access. My letter today is in response to the FCC's Public Notice, which, among other things, considers changes to the Universal Service Fund (USF) programs, including E-Rate.

As a suburban public school district bordered by designated Opportunity Zones in Pennsylvania, we have seen significant changes in our socioeconomic conditions since the "great recession." In order to continue to achieve our mission of developing productive and responsible citizens, we have committed to preparing the children of our community for the world in which they will live. This commitment requires an investment in the technological tools necessary for success in that future. The E-Rate program has been a critical component for providing such resources in a fiscally responsible manner. We have been able to provide families with access through our kindergarten through grade twelve 1:1 device program. Our curriculum resources are accessible anytime and anywhere. Most importantly, the knowledge and skills children are developing are preparing them for achieving success in the community and beyond.

The E-Rate program, and the broader USF program, is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted in 2014, allowing those changes to progress and play out as intended. Changes to the E-Rate program and the broader USF program must be focused on bolstering and strengthening the original intent of the underlying programmatic statute, expanding equitable access to connectivity in multiple areas, through all four USF programs (E-Rate, Rural Health Care, Lifeline, and Connect America Fund).

The organizing theme of the proposed rule is a focus on a funding cap for the USF program, including pairing E-Rate under a funding cap with Rural Health Care. E-Rate played a critical role in the rapid and significant expansion of connectivity in schools, and I am concerned that the proposed rule will unnecessarily pit two important priorities—connectivity in schools with rural health care—against each other, resulting in an arbitrary funding pressure that not only disregards and dismisses the original intent of the statute creating all four USF programs, but also stands to undermine and threaten the great progress of E-Rate.

*It is the mission of the Ridley School District to create a caring environment that gives all students the opportunity to achieve their fullest personal and academic potential in order to become productive and responsible citizens.*



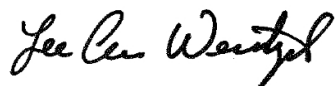
We are opposed to the rule as drafted. The proposed rule conflicts with the original legislative intent of the underlying 1996 Telecommunications Act, which was explicit in its creation of two separate and distinct programs for schools/libraries and rural health care providers. The proposed rule unnecessarily pits schools/libraries against rural hospitals/clinics, creating a false race to the bottom under which both programs and the communities they support lose. The proposed rule will likely immobilize E-Rate funding and expand confusion among beneficiaries. Specific to E-Rate and schools, where school system leaders have a responsibility to balance their budget annually, the idea that the E-Rate funding would be hamstrung and lack certainty in availability will certainly impact how districts plan to continue (or discontinue, should funding not be certain or reliable) their effort to build out connectivity to meet the learning needs of their students.

The goal of the E-Rate program is simple: equitable access to affordable connectivity. While the overwhelming majority of schools and libraries are connected, the ongoing conversation about connectivity and E-Rate must continue to support and protect the shift from establishing connectivity to ensuring adequate connectivity--specifically, access to high-speed broadband. A massive overhaul of the E-Rate program without considering its initial purpose—one that has yet to be fully recognized—is poor policy. The FCC must support continuation of an E-Rate program that remains focused on expanding the E-Rate program from simple connectivity to expanded connectivity and the future changes with the associated costs that will occur.

Without E-Rate, the Ridley School District would not have the robust network and device access. Prior to the 2014 changes, our district primarily used Category 1 funding for Internet and cell phone services. Local tax dollars were used to build our local area network due to little certainty that E-Rate funds would be available for internal connections. The modernization to allow Category 2 services for internal connections enabled the district to upgrade the district Wi-Fi to all 13 district-managed structures. This opportunity financially assisted the local tax dollars to upgrade the entire network system by being able to plan for the changes strategically. Our complete system of access points, switches, and firewalls have been improved. As we continue our system work, an uninterruptible power supply (UPS) will be the next project undertaken with E-Rate. The performance enhancements of speed, bandwidth, and security allows for our students to have use of the tools necessary for college and career.

In closing, I reiterate my district's continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning and oppose the rule as drafted. Thank you for considering these comments.

Sincerely,



Lee Ann Wentzel

